

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MARTHA FEDORIW
4134 Cambridge Court
Schnecksville, PA 18078

Civil Action No.:
1:07-CV-07446-HB

Plaintiff,

RULE 26(a)(1) DISCLOSURE

-against-

CARL ZEISS VISION, INC.
13017 North Kingston Avenue
Chester, VA 23836
and
REED EXHIBITION COMPANIES
383 Main Avenue
Norwalk, CT 06851
and
MAUK DESIGN, INC.
330 Fell Street
San Francisco, CA 94102
and
PINNACLE EXHIBITS, INC.
22400 NW Westmark Drive
Hillsboro, OR 97124

Defendants,

and
NEW YORK CONVENTION CENTER
OPERATING CORPORATION
655 West 34th Street
New York, NY 10001

Cross-Defendant.
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Defendant, MAUK DESIGN, INC., respectfully submits the following initial disclosures of information reasonably available as of this date pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure.

A. Individuals Likely to Have Discoverable Information:

The following individuals are likely to have discoverable information that Mauk Design,

Incorporated may use to support its claims or defenses:

1. Mitchell Mauk, President
330 Fell Street
San Francisco, CA 94102

Mitchell Mauk is President and sole shareholder of Mauk Design, Inc. and is likely to have discoverable information regarding the design of the Carl Zeiss Vision trade show exhibit.

2. Lawrence Raines, Former Senior Designer at Mauk Design, Inc.
Last Known Address: 441 Vasser Avenue
Berkley, CA 94708

Lawrence Raines is a former Senior Designer who is likely to have discoverable information regarding the design of the Carl Zeiss Vision trade show exhibit.

B. Documents in Defendant's Possession, Custody or Control

Defendant, MAUK DESIGN, INC., may use the following documents within its possession, custody or control to support their claims or defenses:

1. Estimate/Proposal between Sola/Carl Zeiss Vision and Mauk Design, Inc.
(Exhibit "A")
2. Defendant, Mauk Design, Inc. is in possession of photographs, preliminary and secondary design concepts, and computer generated models of the exhibit all of which are electronically stored. These photos and images will be provided.

C. Damages

Other than costs, reasonable attorneys' fees and such other relief as the Court deems just and proper, defendant, MAUK DESIGN, INC. is not seeking monetary damages from plaintiff.

D. Insurance Information

Defendant, MAUK DESIGN, INC. is insured by State Farm Fire and Casualty Company with limits of \$1,000,000 per occurrence under Policy No. 97-63-1046-0 during the applicable policy period of April 4, 2005 through April 4, 2006. The insurance policies are in the possession of State Farm Fire and Casualty Insurance Company in California and will be available for inspection and copying to all parties upon request.

Defendant, MAUK DESIGN, INC., reserves the right to amend these initial disclosures as further information becomes available.

Dated: Mineola, New York
June 5, 2008

Respectfully submitted,

KELLY, RODE & KELLY, LLP
Attorneys for Defendant
MITCHELL & COMPANY, INC.
330 Old Country Road, Suite 305
Mineola, New York 11501

Eric B. Betron

ERIC B. BETRON (6855)

TO: MEYERSON & O'NEILL
Admitted Pro Hac Vice
Office & P.O. Address
1700 Market Street, Suite 3025
Philadelphia, PA 19103
(215) 972-1376

WINGATE, RUSSOTTI & SHAPIRO, LLP
Attorneys for Plaintiff
Office & P.O. Address
420 Lexington Avenue, Suite 2750
New York, New York 10170
(212) 986-7353

BIEDERMANN, HOENIG, MASSAMILLLO &
RUFF, P.C.
Attorneys for Defendant
CARL ZEISS VISION, INC.
570 Lexington Avenue, 16th Floor
New York, New York 10022
(212) 697-6555

LAW OFFICES OF EDWARD GARFINKEL
Attorneys for Defendant
NEW YORK CONVENTION CENTER OPERATING
CORPORATION
110 William Street
New York, New York 10038-3901
(212) 809-8000

PEPPER HAMILTON, LLP
Attorneys for Defendant
REED EXHIBITION COMPANIES
301 Carnegie Center, Suite 400
Princeton, NJ 08543-5276
(609) 951-4125

HOEY, KING, TOKER & EPSTEIN
Attorneys for Defendant
PINNACLE EXHIBITS, INC.
55 Water Street, 28th Floor
New York, New York 10041
(212) 612-4478

CERTIFICATE OF SERVICE

I hereby certify that on June 5, 2008, I served a true copy of the annexed RULE 26(a)(1) DISCLOSURE by mailing same in a sealed envelope, by first class mail with postage prepaid thereon, in a post-office or official depository of the U.S. Postal Service within the State of New York, and via electronic filing, addressed to the last known address of the addressee(s) as indicated below:

Peter Greiner

MEYERSON & O'NEILL
1700 Market Street, Suite 3025
Philadelphia, PA 19103
Email: pgreiner@meyersonlawfirm.com

Stavros E. Sitinas

WINGATE, RUSSOTTI & SHAPIRO, LLP
420 Lexington Avenue, Suite 2750
New York, New York 10170
Email: ssitinas@wrslaw.com

Peter Hans Cooper

BIEDERMANN, HOENIG,
MASSAMILLO & RUFF, P.C.
570 Lexington Avenue, 16th Floor
New York, New York 10022
Email: pcooper@brhr.com

Heidi M. Weiss

LAW OFFICES OF EDWARD GARFINKEL
110 William Street
New York, New York 10038-3901
Email: heidi.weiss@aig.com

Angelo Anthony Stio, III

PEPPER HAMILTON, LLP
301 Carnegie Center, Suite 400
Princeton, NJ 08543-5276
Email: stioa@pepperlaw.com

Gregory Edward Walthall

HOEY, KING, TOKER & EPSTEIN
55 Water Street, 28th Floor
New York, New York 10041
Email: gwalthall@hoeyking.com



ERIC B. BETRON (6855)